

Sarah L. Bullard

From: Lynn Lehnert
Sent: Monday, March 27, 2017 9:45 AM
To: Sarah L. Bullard
Subject: FW: Missouri Primate Foundation et al v. PETA et al., Eastern Dist. of Missouri

Exhibit B

From: Kurtis B. Reeg
Sent: Friday, March 24, 2017 6:30 PM
To: James Martin
Cc: Lynn Lehnert; Marissa Curran
Subject: Re: Missouri Primate Foundation et al v. PETA et al., Eastern Dist. of Missouri

We'll just file it with a motion for leave. There's no prejudice to your client since we offered you extra time. Kurt

On Mar 24, 2017, at 5:58 PM, James Martin <JMartin@Polsinelli.com> wrote:

Kurt:

PETA is unable to take a position on the motion until reviewing the proposed filing. Please send me the proposed filing and I will pass it along.

Thanks,
Jim Martin

Sent from my iPhone

On Mar 24, 2017, at 4:32 PM, Kurtis B. Reeg <kreeg@goldbergsegalla.com> wrote:

We just want to add 1 case and a few sentences about it. Kurt

On Mar 24, 2017, at 4:17 PM, Lynn Lehnert <llehner@goldbergsegalla.com> wrote:

Hi Jim
Thanks for the response. A less than three page supplement to what we have already filed.
Lynn

Lynn Lehnert
Associate | DIRECT 314.446.3359 | EXT 8359
MOBILE 314.349.8905
8000 Maryland Avenue, Suite 640 | St. Louis, MO 63105

On Mar 24, 2017, at 4:55 PM, James Martin <JMartin@Polsinelli.com> wrote:

Lynn:

Just to clarify, are you asking to do a supplemental memo that would be within the 3 or so pages that you didn't use for your opposition, or would you instead want to do a "replacement" memo that is within the 15 page limit, or something else? I'm not sure it makes much difference, but I am just anticipating the question from my client. (For example, they would probably be less likely to approve a request for a new 10-pages as opposed to a request to do a 3-page supplement).

Once I hear back from you, I will talk to my client and get back to you as soon as I can.

(I am leaving the office now, but you can call my cell or email me. My cell is 314-691-4199).

Regards,
Jim Martin

James Martin

Shareholder

jmartin@polsinelli.com

314.552.6802

100 S. Fourth Street, Suite 1000
St. Louis, MO 63102

polsinelli.com

<image001.png>

Polsinelli PC, Polsinelli LLP in California

From: Lynn Lehnert
[<mailto:llehner@goldbergsegalla.com>]
Sent: Friday, March 24, 2017 2:47 PM
To: James Martin; Kurtis B. Reeg
Cc: Sarah L. Bullard; Marissa Curran
Subject: RE: Missouri Primate Foundation et al v. PETA et al., Eastern Dist. of Missouri

Hi Jim

We'd like to file a very brief supplemental memo in opposition. Would you agree to give us until Tuesday March 28 to do so and we'll add three days to your responses?

If so please advise and we'll send you a stipulated order.

Thanks and have a good weekend

Lynn

From: James Martin [<mailto:JMartin@Polsinelli.com>]
Sent: Monday, March 06, 2017 10:55 AM
To: Lynn Lehnert; Kurtis B. Reeg
Cc: Sarah L. Bullard; Marissa Curran
Subject: RE: Missouri Primate Foundation et al v. PETA et al., Eastern Dist. of Missouri

Lynn:

I have one correction for the Stipulated Order—our pleading is technically a “reply”, not a “sur-reply”.

With that correction, you have our consent to file with the Court.

Regards,
Jim Martin

James Martin

Shareholder

jmartin@polsinelli.com
314.552.6802
100 S. Fourth Street, Suite 1000
St. Louis, MO 63102
polsinelli.com

<image001.png>

Polsinelli PC, Polsinelli LLP in California

From: Lynn Lehnert [<mailto:llehner@goldbergsegalla.com>]
Sent: Monday, March 06, 2017 9:09 AM
To: Kurtis B. Reeg; James Martin
Cc: Sarah L. Bullard; Marissa Curran
Subject: RE: Missouri Primate Foundation et al v. PETA et al., Eastern Dist. of Missouri

Good morning

Attached is a draft order regarding the extensions agreed to below. Please advise if this is acceptable and if so we'll file with the court.

Thanks

Lynn

From: Kurtis B. Reeg
Sent: Friday, March 03, 2017 3:08 PM
To: 'James Martin'; Lynn Lehnert
Cc: Sarah L. Bullard; Marissa Curran

Subject: RE: Missouri Primate Foundation et al v. PETA
et al., Eastern Dist. of Missouri

Thanks Jim. Yes, happy to
reciprocate on your request as
well. Enjoy the day! Kurt

Kurtis B. Reeg
Partner | DIRECT 314.446.3351 | EXT 8351
MOBILE 314.574.2287
8000 Maryland Avenue, Suite 640 | St. Louis, MO 63105

From: James Martin [<mailto:JMartin@Polsinelli.com>]
Sent: Friday, March 03, 2017 2:34 PM
To: Kurtis B. Reeg; Lynn Lehnert
Cc: Sarah L. Bullard; Marissa Curran
Subject: RE: Missouri Primate Foundation et al v. PETA
et al., Eastern Dist. of Missouri

Kurt:

We consent to your request. (My apologies for the delay in getting back to you—my kids don't have school today, so I am enjoying a rare free Friday).

In turn, we would like to request an additional seven days for our reply. I think that would put your response deadline at March 22, and our reply deadline at April 5. Please let me know if that is agreeable.

Thanks,
Jim Martin

James Martin

Shareholder

jmartin@polsinelli.com
314.552.6802
100 S. Fourth Street, Suite 1000
St. Louis, MO 63102
polsinelli.com

<image001.png>

Polsinelli PC, Polsinelli LLP in California

From: Kurtis B. Reeg
[<mailto:kreeg@goldbergsegalla.com>]
Sent: Friday, March 03, 2017 10:24 AM
To: Lynn Lehnert; James Martin

Cc: Sarah L. Bullard
Subject: RE: Missouri Primate Foundation et al v. PETA et al., Eastern Dist. of Missouri

Jim:

I'm out of the office all next week at a legal conference (FDCC) in SC; that's the reason for the request. Thanks. Kurt

<image002.jpg>

Kurtis B. Reeg, Esq.

Partner

8000 Maryland Avenue, Suite 640 | St. Louis, MO 63105
DIRECT 314.446.3351 | FAX 314.446.3360
MOBILE 314.574.2287
kreeg@goldbergsegalla.com

[**vCard**](#) | www.GoldbergSegalla.com

This email message and any attachments are confidential. If you are not the intended recipient, please immediately reply to the sender and delete the message from your email system. Thank you.

Privileged Attorney-Client Communication / Attorney's Work Product

From: Lynn Lehnert
Sent: Friday, March 03, 2017 10:21 AM
To: 'jmartin@polsinelli.com'
Cc: Kurtis B. Reeg; Sarah L. Bullard
Subject: Missouri Primate Foundation et al v. PETA et al., Eastern Dist. of Missouri

Good morning –

We represent the plaintiffs in the above-referenced matter. May we have a 2 week extension to respond to your motion to dismiss? This would make our response due on March 22.

Please advise and we can draft a stipulated order for the court for your review.

Thanks!
Lynn

<image002.jpg>

Lynn Lehnert, Esq.

8000 Maryland Avenue, Suite 640 | St. Louis, MO 63105

DIRECT 314.446.3359 | FAX 314.446.3360

MOBILE 314.349.8905

llehner@goldbergsegalla.com

[vCard](#) | www.GoldbergSegalla.com

This email message and any attachments are confidential. If you are not the intended recipient, please immediately reply to the sender and delete the message from your email system. Thank you.

Privileged Attorney-Client Communication / Attorney's Work Product

This electronic mail message contains CONFIDENTIAL information which is (a) ATTORNEY - CLIENT PRIVILEGED COMMUNICATION, WORK PRODUCT, PROPRIETARY IN NATURE, OR OTHERWISE PROTECTED BY LAW FROM DISCLOSURE, and (b) intended only for the use of the Addressee(s) named herein. If you are not an Addressee, or the person responsible for delivering this to an Addressee, you are hereby notified that reading, copying, or distributing this message is prohibited. If you have received this electronic mail message in error, please reply to the sender and take the steps necessary to delete the message completely from your computer system.

This electronic mail message contains CONFIDENTIAL information which is (a) ATTORNEY - CLIENT PRIVILEGED COMMUNICATION, WORK PRODUCT, PROPRIETARY IN NATURE, OR OTHERWISE PROTECTED BY LAW FROM DISCLOSURE, and (b) intended only for the use of the Addressee(s) named herein. If you are not an Addressee, or the person responsible for delivering this to an Addressee, you are hereby notified that reading, copying, or distributing this message is prohibited. If you have received this electronic mail message in error, please reply to the sender and take the steps necessary to delete the message completely from your computer system.

This electronic mail message contains CONFIDENTIAL information which is (a) ATTORNEY - CLIENT PRIVILEGED COMMUNICATION, WORK PRODUCT, PROPRIETARY IN NATURE, OR OTHERWISE PROTECTED BY LAW FROM DISCLOSURE, and (b) intended only for the use of the Addressee(s) named herein. If you are not an Addressee, or the person responsible for delivering this to an Addressee, you are hereby notified that reading, copying, or distributing this message is prohibited. If you have received this electronic mail message in error, please reply to the sender and take the steps necessary to delete the message completely from your computer system.

This electronic mail message contains CONFIDENTIAL information which is (a) ATTORNEY - CLIENT PRIVILEGED COMMUNICATION, WORK PRODUCT, PROPRIETARY IN NATURE, OR OTHERWISE PROTECTED BY LAW FROM DISCLOSURE, and (b) intended only for the use of the Addressee(s) named herein. If you are not an Addressee, or the person responsible for delivering this to an Addressee, you are hereby notified that reading, copying, or distributing this message is prohibited. If you have received this electronic mail message in error, please reply to the sender and take the steps necessary to delete the message completely from your computer system.
